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November 9, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

**Attn: Patrick Forster, Senior Engineer
Room 3-A104
Policy Division
Wireless Telecommunications Bureau**

**Re: Kankakee Cellular L.L.C.,
Implementation Plan of Wireless E-911 Phase II
Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of Kankakee Cellular L.L.C., we are transmitting herewith its Report on Implementation of Wireless E-911 Phase II Automatic Location Identification.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Very truly yours,


Robert M. Jackson

Attachment
cc(w/att): Bruce G. Patterson

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List ABCDE

Kankakee Cellular L.L.C.
5131 Meadowlark Lane
Portage, Michigan 49024-5709

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**Attention: Patrick Forster, Senior Engineer
Room 3-A104
Policy Division
Wireless Telecommunications Bureau**

**Re: Implementation Plan of Wireless E-911 Phase II
Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102**

E-911 PHASE II STATUS REPORT

Dear Ms. Salas:

In accordance with the Third Report and Order in CC Docket No. 94-102 and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, we hereby submit our report on the status of implementation plans for Wireless E-911 Phase II Automatic Location Information ("ALI"), as follows:

Background/Contact Information

1) Carrier Identifying Information:

Kankakee Cellular L.L.C.
TRS Number: DNA

2) Contact Information: Bruce G. Patterson, Manager
Kankakee Cellular L.L.C.
5131 Meadowlark Lane
Portage, Michigan 49024-5709
Tel: 616-383-1157
FAX: 616-383-0734

and

Robert M. Jackson
Blooston, Mordkofsky, Jackson & Dickens
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Washington, D.C. 20037
Tel: 202-828-5515
FAX: 202-828-5568
E-Mail: rmj@bmjd.com

E-911 Phase II Location Technology Information

1) Type of Technology: We are the licensee of the Frequency Block A cellular system serving the Kankakee, Illinois MSA. Our cellular service area is geographically adjacent to, and has an economic community of interest with, the Chicago, Illinois MSA ("the Chicago MSA"). Southwestern Bell Mobile Systems, Inc. d/b/a Cellular One - Chicago ("SBMS") is the Frequency Block A cellular carrier serving the Chicago MSA. Switching functions for our system are performed by SBMS' Chicago MSA cellular switch.

For our E-911 Phase II deployment, we intend to utilize the same ALI technology (be it handset-based or network-based) and the same brand of ALI equipment as deployed by SBMS for its Chicago MSA system. For us, the most economically feasible solution is to install the same ALI solution selected by SBMS.

2) Testing and Verification: We anticipate using the same testing methodology employed by SBMS for the deployment of Phase II ALI capability in its Chicago MSA cellular system. Since there is very little information available from the vendors, it is difficult to determine at present precisely what this testing methodology will entail. However, we would anticipate regular testing of random locations throughout our service area, beginning in areas where the PSAP has requested Phase II deployment.

3) Implementation Details and Schedule: We plan to adhere to the implementation schedule established by the Commission in the Fourth Memorandum Opinion and Order, released September 8, 2000. However, our ability to do so will depend, in large measure, on the ability of equipment manufacturers to have their products operational and delivered in a timely manner. It is anticipated that the equipment installation will be performed by the equipment vendor under a "turn-key" contract.

4) PSAP Interface: We anticipate employing the same PSAP interface technology to be employed by SBMS in the operation of its Chicago MSA cellular system.

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5) Existing Handsets: We will continue to keep abreast of our current handset suppliers' ALI deployment plans. Our subscribers will be informed beginning sometime in 2001, by way of bill inserts, of the coming availability of ALI-capable handsets and given the opportunity to acquire them, when available. Subscribers will also be informed of the December 31, 2005 date by which basically all or substantially all handsets must be ALI-capable.

6) Location of Non-Compatible Handsets: We will provide, at a minimum, Phase I ALI information for handsets that are incompatible with the Phase II technology if the local PSAP has Phase I capability and has requested the delivery of Phase I information.

Beginning with the October 1, 2001 date for starting to sell and activate ALI-capable handsets, we will tout their advantages to new subscribers and recommend that non-compatible handsets be restricted for use at campus locations. We will use a "best practices" solution in connection with providing ALI to non-compatible handsets, assuming, of course, that the PSAP is equipped to utilize Phase II data. It appears that such solutions are currently in development and, at this stage, we are not committed to any particular solution.

7) Other Information: The local PSAP has not requested the routing of Phase II E-911 ALI information.

Respectfully submitted

Kankakee Cellular L.L.C.

Dated: 11-09-00

By: 

Bruce G. Patterson
Manager